# IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: : Case No. 22-10969-elf

:

Ricci Transport & Recovery Inc., : Chapter 11

:

Debtor. :

## Fourth Amended Plan of Reorganization for Small Business Under Chapter 11

Ricci Transport & Recovery Inc.'s Fourth Amended Plan of Reorganization, Dated January 11, 2023.

CIBIK LAW, P.C.

Counsel for Debtor

Ricci Transport & Recovery Inc.

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## **Table of Contents**

	Background	3
Article 1	Summary	4
Article 2	Classification of Claims and Interests	4
	2.01 Class 1	4
	2.02 Class 2	4
	2.03 Class 3	4
	2.04 Class 4	4
Article 3	Treatment of Administrative Expense Claims, Priority Tax Claims, and Quarterly and Court Fe	es5
	3.01 Unclassified claims	
	3.02 Administrative expense claims	5
	3.03 Priority tax claims	5
	3.04 Statutory fees	5
Article 4	Treatment of Claims and Interests Under the Plan	5
	4.01 Voting rights and plan acceptance	5
	4.02 Treatment of claims and interests	5
Article 5	Allowance and Disallowance of Claims	ε
	5.01 Disputed Claim	ε
	5.02 Delay of distribution on a disputed claim	ε
	5.03 Settlement of disputed claims	6
Article 6	Provisions for Executory Contracts and Unexpired Leases	6
	6.01 Assumed executory contracts and unexpired leases	ε
Article 7	Means for Implementation of the Plan	
Article 8	General Provisions	8
	8.01 Definitions and rules of construction	8
	8.02 Effective date	8
	8.03 Severability	8
	8.04 Binding effect	8
	8.05 Captions	
	8.06 Controlling effect	8
	8.07 Corporate governance	8
	8.08 Retention of Jurisdiction	8
Article 9	Discharge	8
Exhibit A	Liquidation Analysis	
Exhibit B	Cash Flow Projection	
Exhibit C	Estimated Schedule of Plan Payments and Trustee Distributions	

## **Background**

## **Description and History of the Debtor's Business**

The Debtor is a corporation. Since 2006, the Debtor has been in the business of vehicular towing services. Much of the Debtor's revenue comes from its contract as an emergency towing service vendor for AAA. The Debtor experienced success and stability for much of its history, but like many businesses, it took a significant hit from the COVID-19 pandemic.

## **Liquidation Analysis**

To confirm the Plan, the Court must find that all creditors and equity interest holders who do not accept the Plan will receive at least as much under the Plan as such claim and equity interest holders would receive in a chapter 7 liquidation. A liquidation analysis is attached to the Plan as Exhibit A.

Ability to make future plan payments and operate without further reorganization The Plan Proponent must also show that it will have enough cash over the life of the Plan to make the required Plan payments and operate the debtor's business.

The Plan Proponent has provided projected financial information as Exhibit B.

The Plan Proponent's financial projections show that the Debtor will have projected disposable income (as defined by 11 U.SC. § 1191(d)) for the period described in § 1191(c)(2) of \$3,662.00.

The final Plan payment is expected to be paid in the 60th month following confirmation of this Plan.

#### The Debtor's Bankruptcy Case

The Debtor filed this chapter 11 bankruptcy case on April 14, 2022. The Debtor participated in an initial interview with the U.S. Trustee on April 25, 2022, the meeting of creditors was held and concluded on May 17, 2022, and a status hearing was held and concluded on June 8, 2022. The Court set a bar date of July 1, 2022, for non-governmental claims and October 11, 2022, for governmental claims. The Debtor does not expect any further claims to be filed.

The Debtor had some difficultly finding an accountant willing to accept employment under a chapter 11 bankruptcy case, which has caused delay in preparation of the monthly operating reports that must be filed with the Court. Rey's Tax and Accounting Services ("the Accountant") accepted the task and was appointed by the Court on June 23, 2022. All monthly operating reports have since been filed.

The Debtor recently amended Schedules E/F to add two loans that were erroneously omitted. Those loans, from James Ricci and Jennifer Ricci, have been forgiven by the creditors and will not be paid through this Plan. Schedule E/F was also amended to correct the listed creditor for the Debtor's 2020 Paycheck Protection Program loan. The original schedules erroneously listed the creditor as the U.S. Small Business Administration, but the amendment correctly listed the creditor as First Bank. First Bank was notified of the amendment but did not file a claim within the time allowed. The Debtor was recently informed that the PPP loan has been forgiven.

The original plan indicated that the Debtor intended to sell up to five of its seven tow trucks. But as the monthly operating reports demonstrate, the Debtor has recently seen an uptick in business which is made possible by the concurrent operation of four trucks. Thus, the Debtor intends to pursue the sale of three trucks. No potential buyers have been identified. Because the three trucks to be sold have not been operational during the periods for which operating reports have been submitted, the sale of those trucks will not have an impact on cash flow projections.

The Debtor is currently seeking confirmation of this plan under 11 U.S.C. § 1191(b).

## Article 1 Summary

This Plan of Reorganization (the Plan) under chapter 11 of the Bankruptcy Code (the Code) proposes to pay creditors of Ricci Transport & Recovery Inc. (the Debtor) from various sources, including sale of assets, cash flow from operations, and future income.

This Plan provides for: 1 class of priority claims;

1 class of secured claims;

1 class of non-priority unsecured claims; 1 and class of equity security holders.

Non-priority unsecured creditors holding allowed claims will receive distributions, which the proponent of this Plan has valued at approximately 100 cents on the dollar. This Plan also provides for the payment of administrative and priority claims.

All creditors and equity security holders should refer to Articles 3 through 6 of this Plan for information regarding the precise treatment of their claim.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one. (If you do not have an attorney, you may wish to consult one.)

## **Article 2** Classification of Claims and Interests

#### 2.01 Class 1

There are no allowed claims entitled to priority under § 507(a) of the Code (except administrative expense claims under § 507(a)(2) and priority tax claims under § 507(a)(8)) and, thus, no creditors in Class 1.

## 2.02 Class 2

The claim of FC Marketplace LLC to the extent allowed as a secured claim under 11 U.S.C. § 506.

#### 2.03 Class 3

All non-priority unsecured claims allowed under 11 U.S.C. § 502 and all deficiency claims of Class 2 claimholders.

## 2.04 Class 4

Equity interests of the Debtor.

# Article 3 Treatment of Administrative Expense Claims, Priority Tax Claims, and Quarterly and Court Fees

#### 3.01 Unclassified claims

Under 11 U.S.C. § 1123(a)(1), administrative expense claims, and priority tax claims are not in classes. Claimholders of unclassified claims are not entitled to vote on this plan.

## 3.02 Administrative expense claims

Each holder of an administrative expense claim allowed under 11 U.S.C. § 503 will be paid in full. Claimholders of administrative expense claims are not entitled to vote on this plan.

## 3.03 Priority tax claims

Each holder of a priority tax claim will be paid in full with interest at an annual rate of 3%. Claimholders of priority tax claims are not entitled to vote on this plan.

- The priority tax claim of the Commonwealth of Pennsylvania will be paid in the amount of \$13,915.43 with interest at an annual rate of 3%.
- The priority tax claim of the City of Philadelphia will be paid in the amount of \$1,354.75 with interest at an annual rate of 3%.
- The priority tax claim of the Internal Revenue Service will be paid in the amount of \$600.00 with interest at an annual rate of 3%.

## 3.04 Statutory fees

All fees required to be paid under 28 U.S.C. § 1930 that are owed on or before the effective date of this Plan have been paid or will be paid on the effective date.

## **Article 4** Treatment of Claims and Interests Under the Plan

#### 4.01 Voting rights and plan acceptance

Only Creditors in classes that are impaired may vote on whether to accept or reject the Plan, and only Creditors holding Allowed Claims may vote. A class accepts the Plan when more than one-half (1/2) in number and at least two-thirds (2/3) in dollar amount of the Allowed Claims that actually vote, vote in favor of the Plan. A class that is not impaired is deemed to accept the Plan.

## 4.02 Treatment of claims and interests

Claims and interests shall be treated as follows under this Plan:

Class	Impairment	Treatment
Class 1 - <b>Priority claims</b> excluding those in Article 3	☐ Impaired ☐ Unimpaired	Not applicable.
Class 2 – Secured claim of FC Marketplace LLC	☑ Impaired □ Unimpaired	Class 2 is impaired by this Plan. The holder of the Class 2 Claim will be paid in full, in cash, with interest at an annual rate of 6%. Claimholders of Class 2 claims are entitled to vote on this plan.

Class	Impairment	Treatment
Class 3 – Non-priority unsecured creditors and all deficiency claims of Class 2 claimholders	⊠ Impaired □ Unimpaired	Class 3 is impaired by this Plan. Each holder of a Class 3 Claim will be paid pro-rata, in cash, from funds available after all Class 1 and Class 2 claims have been paid in full. Claimholders of Class 3 claims are entitled to vote on this plan.
Class 4 - Equity security holders of the Debtor	☐ Impaired ☐ Unimpaired	Not applicable.

## **Article 5** Allowance and Disallowance of Claims

## 5.01 Disputed Claim

A disputed claim is a claim that has not been allowed or disallowed by a final non-appealable order, and as to which either: (i) a proof of claim has been filed or deemed filed, and the Debtor or another party in interest has filed an objection; or (ii) no proof of claim has been filed, and the Debtor has scheduled such claim as disputed, contingent, or unliquidated.

## 5.02 Delay of distribution on a disputed claim

No distribution will be made on account of a disputed claim unless such claim is allowed by a final non-appealable order.

## 5.03 Settlement of disputed claims

The Debtor will have the power and authority to settle and compromise a disputed claim with court approval and compliance with Rule 9019 of the Federal Rules of Bankruptcy Procedure.

## **Article 6** Provisions for Executory Contracts and Unexpired Leases

## 6.01 Assumed executory contracts and unexpired leases

(a) The Debtor assumes, and if applicable assigns, the following executory contracts and unexpired leases as of the effective date:

Party	<b>Description of Contract</b>	Election
AAA	Debtor provides towing services as a contractor for AAA.	<ul><li>☑ Assumed</li><li>☐ Rejected</li></ul>
PFA Partners	Parking lot and garage lease for 2705 Black Lane Place, Suite 300, Philadelphia, PA 19154.	<ul><li>☑ Assumed</li><li>☐ Rejected</li></ul>
Santander	Lease of two (2) 2016 Ford F150 Pickup Trucks	<ul><li>☑ Assumed</li><li>☐ Rejected</li></ul>

(b) Except for executory contracts and unexpired leases that have been assumed, and if applicable assigned, before the effective date or under section 6.01(a) of this Plan, or that are the subject of a pending motion to assume, and if applicable assign, the Debtor will be conclusively deemed to have rejected all executory contracts and unexpired leases as of the effective date.

A proof of a claim arising from the rejection of an executory contract or unexpired lease under this section must be filed no later than thirty-five (35) days after the date of the order confirming this Plan.

## **Article 7** Means for Implementation of the Plan

The Debtor may sell up to three of its seven tow trucks. If the trucks are sold pursuant to this Plan, the transaction will be exempt from transfer tax pursuant to 11 U.S.C. § 1146(a). The Debtor expects that the proceeds of that sale could be as much as \$40,000. The Debtor would be permitted to use the sale proceeds to pay FC Marketplace LLC in satisfaction of its allowed secured claim (Class 2). If the proceeds of the sale exceed the amount of FC Marketplace's allowed secured claim, all excess funds will be paid to the trustee for distribution to creditors.

Starting on the Effective Date and then monthly by the 15th day after the close of the months set forth on the Debtor's projected cash flows on Exhibit B, the Debtor will pay its aggregate Disposable Income to the Subchapter V Trustee for disbursement consistent with this Plan. In connection with each monthly disbursement date, the Debtor shall deliver to the Subchapter V Trustee (collectively, the "Post-Petition Obligations"): (1) a report setting forth the calculation of the Disposable Income distributable to creditors, (2) a copy of the Debtor's bank account statements and any other backup reasonably requested by the Subchapter V Trustee to confirm the propriety of the Disposable Income calculation, and (3) a check payable to "Richard Furtek, Subchapter V Trustee for the Estate of Ricci Transport & Recovery, Inc." in the amount of the Disposable Income.

If the Debtor fails to comply with any of its Post-Petition Obligations or if Subchapter V Trustee disagrees with the Debtor's Disposable Income calculation, he and the Debtor shall work collaboratively to resolve any such dispute, the failure of which shall give rise to the right of the Subchapter V Trustee to file with the Bankruptcy Court a notice of dispute with respect to the Disposable Income calculation and thereby enabling the Subchapter V Trustee or any other party in interest to seek appropriate relief from the Bankruptcy Court. The Subchapter V Trustee shall have the right to retain from the amounts paid to him by the Debtor in the amount of \$400 on each disbursement date on account of the time and services devoted by the Subchapter V Trustee to the services required above. The Subchapter V Trustee shall be responsible for filing post-confirmation distribution reports pursuant to L.B.R. 3021-1.

From and after the Effective Date, the reorganized Debtor may, in the ordinary course and without the necessity of any approval by the Bankruptcy Court, pay the reasonable fees and expenses of professional persons thereafter incurred, including, without

limitation, those fees and expenses incurred in connection with the implementation and consummation of the Plan.

## **Article 8** General Provisions

#### 8.01 Definitions and rules of construction

The definitions and rules of construction set forth in 11 U.S.C. §§ 101 and 102 shall apply when terms defined or construed in the Bankruptcy Code are used in this Plan.

#### 8.02 Effective date

The effective date of this Plan is the first business day following the date that is 14 days after the entry of the confirmation order. If, however, a stay of the confirmation order is in effect on that date, the effective date will be the first business day after the date on which the stay expires or is otherwise terminated.

## 8.03 Severability

If any provision in this Plan is determined to be unenforceable, the determination will in no way limit or affect the enforceability and operative effect of any other provision of this Plan.

## 8.04 Binding effect

The rights and obligations of any entity named or referred to in this Plan will be binding upon and will inure to the benefit of the successors or assigns of such entity.

#### 8.05 Captions

The headings contained in this Plan are for convenience of reference only and do not affect the meaning or interpretation of this Plan.

## 8.06 Controlling effect

Unless a rule of law or procedure is supplied by federal law (including the Code or the Federal Rules of Bankruptcy Procedure), the laws of the State of Pennsylvania govern this Plan and any agreements, documents, and instruments executed in connection with this Plan, except as otherwise provided in this Plan.

#### 8.07 Corporate governance

The Debtor is an "S" corporation organized under the laws of the State of Pennsylvania and governed by all IRS guidelines.

## 8.08 Retention of Jurisdiction

This Court shall retain jurisdiction until substantial consummation of this Plan after confirmation.

## Article 9 Discharge

If the Debtor's Plan is confirmed under § 1191(a), on the effective date of the Plan, the Debtor will be discharged from any debt that arose before confirmation of this Plan, to the extent specified in § 1141(d)(1)(A) of the Code, except that the Debtor will not be discharged of any debt: (i) imposed by this Plan; or (ii) to the extent provided in § 1141(d)(6).

If the Debtor's Plan is confirmed under § 1191(b), confirmation of this Plan does not discharge any debt provided for in this Plan until the court grants a discharge on completion of all payments due within the first 5 years of this Plan, or as otherwise provided in § 1192 of the Code. The Debtor will not be discharged from any debt: (i) on which the last payment is due after the first 5 years of the plan, or as otherwise provided in § 1192; or (ii) excepted from discharge under § 523(a) of the Code, except as provided in Rule 4007(c) of the Federal Rules of Bankruptcy Procedure.

## Exhibit A Liquidation Analysis

Assets					
a. Cash on hand					
b. Accounts receivable\$0.00	1				
c. Inventory\$0.00					
d. Office furniture & equipment\$575.00					
e. Machinery & equipment\$1,200.00					
f. Automobiles					
g. Building & Land\$0.00					
h. Customer list\$0.00					
i. Investment property (such as stocks, bonds or other financial assets)\$0.00					
j. Lawsuits or other claims against third-parties\$0.00					
k. Other intangibles (such as avoiding powers actions)\$0.00					
Total Assets at Liquidation Value\$225,286.27					
Less:					
Secured creditors' recoveries\$87,194.20					
Less:					
Chapter 7 trustee fees and expenses (estimated)\$17,500.00	1				
Less:					
Chapter 11 administrative expenses \$40,000.00					
Less:					
Priority claims, excluding administrative expense claims					
(1) Balance for unsecured claims\$64,710.62	,				
(2) Total dollar amount of unsecured claims\$78,915.83					
Percentage of Claims Which Unsecured Creditors Would					
Receive Or Retain in a Chapter 7 Liquidation:					
Percentage of Claims Which Unsecured Creditors Will					
Receive or Retain under the Plan:	,				

# Exhibit B Cash Flow Projection

	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6
Projected Revenue	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00
Projected Expenses						
Payroll	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00
Worker's Compensation	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00
Rent	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00
Vehicle Expenses	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00
Insurance	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00
Projected Disposable Income	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00
Pusis ata d Passanus	Month 7	Month 8	Month 9	Month 10	Month 11	Month 12
Projected Revenue	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00
Projected Expenses	<b>#45 000 00</b>	¢45,000,00	¢45,000,00	£45 000 00	¢45,000,00	¢45,000,00
Payroll	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00
Worker's Compensation	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00
Rent	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00
Vehicle Expenses	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00
Insurance	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00
Projected Disposable Income	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00
	Month 13	Month 14	Month 15	Month 16	Month 17	Month 18
Projected Revenue	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00
Projected Expenses	ψου, το 4.00	φου, 104.00	ψου, το τ.ου	ψου, 10-1.00	ψου, 10-1.00	φου, 104.00
Payroll	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00
Worker's Compensation	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00
Rent	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00
Vehicle Expenses	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00
Insurance	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00
Projected Disposable Income	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00
	Month 19	Month 20	Month 21	Month 22	Month 23	Month 24
Projected Revenue	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00
Projected Expenses	<b>.</b>	A.=:		A / = : : :		
Payroll	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00
Worker's Compensation	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00
Rent	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00
Vehicle Expenses	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00
Insurance	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00
Projected Disposable Income	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00
	Month 25	Month 26	Month 27	Month 28	Month 29	Month 30
Projected Revenue	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00
Projected Expenses	<b>400, 10 1.00</b>	\$00,70 T.00	\$55,.51.00	\$55, .O 1.00	\$55, .5 i.50	ÇCC, . O 1.00
Payroll	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00
Worker's Compensation	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00
Rent	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00
Vehicle Expenses	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00
Insurance	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00
Projected Disposable Income	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00
,	ψ3,00 <u>2</u> .00	\$5,50 <u>2.</u> 00	\$5,50 <b>L</b> .00	\$5,50 <b>L</b> .00	\$5,50 <b>L</b> .00	\$5,50 <u>2</u> .00

# **Cash Flow Projection (continued)**

	Month 31	Month 32	Month 33	Month 34	Month 35	Month 36
Projected Revenue	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00
Projected Expenses	ψ55, 104.00	ψ55, 104.00	ψ33,104.00	ψ55,104.00	ψ33, 104.00	ψ33, 104.00
Payroll	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00
Worker's Compensation	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00
Rent	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00
Vehicle Expenses	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00
Insurance	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00
Projected Disposable Income	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00
B B	Month 37	Month 38	Month 39	Month 40	Month 41	Month 42
Projected Revenue	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00
Projected Expenses	<b>#45.000.00</b>	<b>#45</b> 000 00	<b>#45.000.00</b>	<b>#45.000.00</b>	<b>#45.000.00</b>	<b>#45.000.00</b>
Payroll	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00
Worker's Compensation	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00
Rent	\$4,612.00	\$4,612.00 \$15,910.00	\$4,612.00 \$15,910.00	\$4,612.00	\$4,612.00	\$4,612.00
Vehicle Expenses Insurance	\$15,910.00 \$11,000.00	\$15,910.00	\$15,910.00	\$15,910.00 \$11,000.00	\$15,910.00	\$15,910.00 \$11,000.00
Projected Disposable Income	\$3,662.00	\$3,662.00	\$11,000.00	\$11,000.00 \$3,662.00	\$11,000.00 \$3,662.00	\$11,000.00
Projected Disposable income	φ3,002.00	φ3,002.00	φ3,002.00	φ3,002.00	φ3,002.00	φ3,002.00
	Month 43	Month 44	Month 45	Month 46	Month 47	Month 48
Projected Revenue	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00
Projected Expenses	700,10110	****	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	<b>,</b> ,	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	<b>4</b> - 2, 1 - 11 - 1
Payroll	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00
Worker's Compensation	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00
Rent	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00
Vehicle Expenses	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00
Insurance	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00
Projected Disposable Income	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00
_	Month 49	Month 50	Month 51	Month 52	Month 53	Month 54
Drainated Davanus						
Projected Revenue Projected Expenses	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00
Payroll	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00
Worker's Compensation	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00
Rent	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00
Vehicle Expenses	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00
Insurance	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00
Projected Disposable Income	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00
B B	Month 55	Month 56	Month 57	Month 58	Month 59	Month 60
Projected Revenue Projected Expenses	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00	\$55,184.00
Payroll	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00	\$15,000.00
Worker's Compensation	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00	\$5,000.00
Rent	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00	\$4,612.00
Vehicle Expenses	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00	\$15,910.00
Insurance	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00	\$11,000.00
Projected Disposable Income	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00

**Exhibit C Estimated Schedule of Plan Payments and Trustee Distributions** 

	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6
Priority						
Cibik Law P.C.	\$508.45	\$508.45	\$508.45	\$508.45	\$508.45	\$508.45
City of Philadelphia	\$139.64	\$139.64	\$139.64	\$139.64	\$139.64	\$139.64
I.R.S.	\$61.01	\$61.01	\$61.01	\$61.01	\$61.01	\$61.01
PA Dep't of Rev.	\$1,434.33	\$1,434.33	\$1,434.33	\$1,434.33	\$1,434.33	\$1,434.33
Rey's Tax & Accounting Service	\$610.13	\$610.13	\$610.13	\$610.13	\$610.13	\$610.13
Richard Furtek, CPA (Trustee)	\$508.44	\$508.44	\$508.44	\$508.44	\$508.44	\$508.44
Secured						
FC Marketplace LLC	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Unsecured						
City of Philadelphia	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
KeyBank N.A.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PA Dep't of Rev.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
T2 Tools Inc.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Starting Balance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Debtor's Payment to Trustee	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00
Distribution to Priority	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00
Distribution to Secured	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Distribution to Unsecured	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Trustee Disbursement/Reporting Fees	\$400.00	\$400.00	\$400.00	\$400.00	\$400.00	\$400.00
Ending Balance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

	Month 7	Month 8	Month 9	Month 10	Month 11	Month 12
Priority						
Cibik Law P.C.	\$508.45	\$508.45	\$508.45	\$423.95	\$0.00	\$0.00
City of Philadelphia	\$139.64	\$139.64	\$139.64	\$116.47	\$0.00	\$0.00
I.R.S.	\$61.01	\$61.01	\$61.01	\$50.91	\$0.00	\$0.00
PA Dep't of Rev.	\$1,434.33	\$1,434.33	\$1,434.33	\$1,196.22	\$0.00	\$0.00
Rey's Tax & Accounting Service	\$610.13	\$610.13	\$610.13	\$508.83	\$0.00	\$0.00
Richard Furtek, CPA (Trustee)	\$508.44	\$508.44	\$508.44	\$424.04	\$0.00	\$0.00
Secured						
FC Marketplace LLC	\$0.00	\$0.00	\$0.00	\$541.58	\$3,262.00	\$3,262.00
Unsecured						
City of Philadelphia	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
KeyBank N.A.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PA Dep't of Rev.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
T2 Tools Inc.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Starting Balance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Debtor's Payment to Trustee	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00
Distribution to Priority	\$3,262.00	\$3,262.00	\$3,262.00	\$2,720.42	\$0.00	\$0.00
Distribution to Secured	\$0.00	\$0.00	\$0.00	\$541.58	\$3,262.00	\$3,262.00
Distribution to Unsecured	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Trustee Disbursement/Reporting Fees	\$400.00	\$400.00	\$400.00	\$400.00	\$400.00	\$400.00
Ending Balance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

	Month 13	Month 14	Month 15	Month 16	Month 17	Month 18
Priority						
Cibik Law P.C.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
City of Philadelphia	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
I.R.S.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PA Dep't of Rev.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Rey's Tax & Accounting Service	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Richard Furtek, CPA (Trustee)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Secured						
FC Marketplace LLC	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00
Unsecured						
City of Philadelphia	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
KeyBank N.A.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PA Dep't of Rev.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
T2 Tools Inc.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Starting Balance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Debtor's Payment to Trustee	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00
Distribution to Priority	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Distribution to Secured	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00
Distribution to Unsecured	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Trustee Disbursement/Reporting Fees	\$400.00	\$400.00	\$400.00	\$400.00	\$400.00	\$400.00
Ending Balance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

	Month 19	Month 20	Month 21	Month 22	Month 23	Month 24
Priority						
Cibik Law P.C.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
City of Philadelphia	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
I.R.S.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PA Dep't of Rev.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Rey's Tax & Accounting Service	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Richard Furtek, CPA (Trustee)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Secured						
FC Marketplace LLC	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00
Unsecured						
City of Philadelphia	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
KeyBank N.A.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PA Dep't of Rev.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
T2 Tools Inc.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Starting Balance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Debtor's Payment to Trustee	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00
Distribution to Priority	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Distribution to Secured	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00
Distribution to Unsecured	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Trustee Disbursement/Reporting Fees	\$400.00	\$400.00	\$400.00	\$400.00	\$400.00	\$400.00
Ending Balance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

	Month 25	Month 26	Month 27	Month 28	Month 29	Month 30
Priority						
Cibik Law P.C.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
City of Philadelphia	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
I.R.S.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PA Dep't of Rev.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Rey's Tax & Accounting Service	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Richard Furtek, CPA (Trustee)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Secured						
FC Marketplace LLC	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00
Unsecured						
City of Philadelphia	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
KeyBank N.A.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PA Dep't of Rev.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
T2 Tools Inc.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Starting Balance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Debtor's Payment to Trustee	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00
Distribution to Priority	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Distribution to Secured	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00
Distribution to Unsecured	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Trustee Disbursement/Reporting Fees	\$400.00	\$400.00	\$400.00	\$400.00	\$400.00	\$400.00
Ending Balance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

	Month 31	Month 32	Month 33	Month 34	Month 35	Month 36
Priority						
Cibik Law P.C.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
City of Philadelphia	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
I.R.S.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PA Dep't of Rev.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Rey's Tax & Accounting Service	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Richard Furtek, CPA (Trustee)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Secured						
FC Marketplace LLC	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00
Unsecured						
City of Philadelphia	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
KeyBank N.A.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PA Dep't of Rev.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
T2 Tools Inc.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00 \$0.00	
Starting Balance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Debtor's Payment to Trustee	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00
Distribution to Priority	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Distribution to Secured	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00
Distribution to Unsecured	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Trustee Disbursement/Reporting Fees	\$400.00	\$400.00	\$400.00	\$400.00	\$400.00	\$400.00
Ending Balance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

	Month 37	Month 38	Month 39	Month 40	Month 41	Month 42
Priority						
Cibik Law P.C.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
City of Philadelphia	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
I.R.S.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PA Dep't of Rev.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Rey's Tax & Accounting Service	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Richard Furtek, CPA (Trustee)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Secured						
FC Marketplace LLC	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$522.38	\$0.00
Unsecured						
City of Philadelphia	\$0.00	\$0.00	\$0.00	\$0.00	\$795.03	\$946.77
KeyBank N.A.	\$0.00	\$0.00	\$0.00	\$0.00	\$1,530.63	\$1,822.61
PA Dep't of Rev.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00 \$210.95	
T2 Tools Inc.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00 \$203.01	
Starting Balance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Debtor's Payment to Trustee	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00
Distribution to Priority	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Distribution to Secured	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$522.38	\$0.00
Distribution to Unsecured	\$0.00	\$0.00	\$0.00	\$0.00	\$2,739.62	\$3,262.00
Trustee Disbursement/Reporting Fees	\$400.00	\$400.00	\$400.00	\$400.00	\$400.00	\$400.00
Ending Balance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

	Month 43	Month 44	Month 45	Month 46	Month 47	Month 48
Priority						
Cibik Law P.C.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
City of Philadelphia	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
I.R.S.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PA Dep't of Rev.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Rey's Tax & Accounting Service	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Richard Furtek, CPA (Trustee)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Secured						
FC Marketplace LLC	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Unsecured						
City of Philadelphia	\$946.77	\$946.77	\$946.77	\$946.77	\$946.77	\$946.77
KeyBank N.A.	\$1,822.61	\$1,822.61	\$1,822.61	\$1,822.61	\$1,822.61	\$1,822.61
PA Dep't of Rev.	\$251.03	\$251.03	\$251.03	\$251.03	\$251.03	\$251.03
T2 Tools Inc.	\$241.59	\$241.59	\$241.59	\$241.59	\$241.59 \$241.59	
Starting Balance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Debtor's Payment to Trustee	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00
Distribution to Priority	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Distribution to Secured	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Distribution to Unsecured	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00
Trustee Disbursement/Reporting Fees	\$400.00	\$400.00	\$400.00	\$400.00	\$400.00	\$400.00
Ending Balance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

	Month 49	Month 50	Month 51	Month 52	Month 53	Month 54
Priority						
Cibik Law P.C.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
City of Philadelphia	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
I.R.S.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PA Dep't of Rev.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Rey's Tax & Accounting Service	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Richard Furtek, CPA (Trustee)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Secured						
FC Marketplace LLC	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Unsecured						
City of Philadelphia	\$946.77	\$946.77	\$946.77	\$946.77	\$946.77	\$946.77
KeyBank N.A.	\$1,822.61	\$1,822.61	\$1,822.61	\$1,822.61	\$1,822.61	\$1,822.61
PA Dep't of Rev.	\$251.03	\$251.03	\$251.03	\$251.03	\$251.03	\$251.03
T2 Tools Inc.	\$241.59	\$241.59	\$241.59	\$241.59	\$241.59	\$241.59
Starting Balance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Debtor's Payment to Trustee	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00
Distribution to Priority	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Distribution to Secured	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Distribution to Unsecured	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00
Trustee Disbursement/Reporting Fees	\$400.00	\$400.00	\$400.00	\$400.00	\$400.00	\$400.00
Ending Balance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

	Month 55	Month 56	Month 57	Month 58	Month 59	Month 60
Priority						
Cibik Law P.C.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
City of Philadelphia	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
I.R.S.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PA Dep't of Rev.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Rey's Tax & Accounting Service	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Richard Furtek, CPA (Trustee)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Secured						
FC Marketplace LLC	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Unsecured						
City of Philadelphia	\$946.77	\$946.77	\$946.77	\$946.77	\$946.77	\$946.77
KeyBank N.A.	\$1,822.61	\$1,822.61	\$1,822.61	\$1,822.61	\$1,822.61	\$1,822.61
PA Dep't of Rev.	\$251.03	\$251.03	\$251.03	\$251.03	\$251.03	\$251.03
T2 Tools Inc.	\$241.59	\$241.59	\$241.59	\$241.59	\$241.59 \$241.59	
Starting Balance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Debtor's Payment to Trustee	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00	\$3,662.00
Distribution to Priority	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Distribution to Secured	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Distribution to Unsecured	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00	\$3,262.00
Trustee Disbursement/Reporting Fees	\$400.00	\$400.00	\$400.00	\$400.00	\$400.00	\$400.00
Ending Balance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

## **Summary of Estimated Schedule of Plan Payments and Trustee Distributions**

	Allowed Claim	Estimated Interest	Estimate of Total Distribution
Priority			
Cibik Law P.C.	\$5,000.00	\$0.00	\$5,000.00
City of Philadelphia	\$1,354.75	\$18.48	\$1,373.23
I.R.S.	\$600.00	\$0.00	\$600.00
PA Dep't of Rev.	\$13,915.43	\$189.76	\$14,105.19
Rey's Tax & Accounting Service	\$6,000.00	\$0.00	\$6,000.00
Richard Furtek, CPA (Trustee)	\$5,000.00	\$0.00	\$5,000.00
Secured FC Marketplace LLC	\$87,194.20	\$11,729.76	\$98,923.96
Unsecured			
City of Philadelphia	\$24,146.00	\$0.00	\$18,783.66
KeyBank N.A.	\$46,483.18	\$0.00	\$36,160.19
PA Dep't of Rev.	\$6,402.33	\$0.00	\$4,980.50
T2 Tools Inc.	\$6,161.65	\$0.00	\$4,793.27
Debtor's Payment to Trustee			\$219,720.00
Distribution to Priority	\$31,870.17	\$208.24	\$32,078.41
Distribution to Secured	\$87,194.20	\$11,729.76	\$98,923.96
Distribution to Unsecured	\$78,915.83	\$0.00	\$64,717.62
Trustee Disbursement/Reporting Fees			\$24,000.00